

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

The South Carolina State Conference )	
Of the NAACP, )	Civil Action No.: 3:21-cv-03302-JMC
and )	
)	
Taiwan Scott, on behalf of himself and all )	
Other similarly situated persons, )	
)	
Plaintiffs, )	
)	
Vs. )	
)	
Henry D. McMaster, in his official capacity )	STATE ELECTION COMMISSION
As Governor of South Carolina; )	DEFENDANTS' LOCAL RULE
Harvey Peeler, in his official capacity as )	26.01 INTERROGATORY ANSWERS
President of the Senate; )	
Luke A. Rankin, in his official capacity as )	
Chairman of the Senate Judiciary; )	
James H. Lucas, in his official capacity as )	
Speaker of the House of Representatives, )	
Chris Murphy, in his official capacity as )	
Chair of the House of Representatives )	
Judicial Committee; )	
Wallace H. Jordan, in his official capacity )	
as Chair of the House of Representatives )	
Elections Law Subcommittee; )	
Howard Knapp, in his official capacity as )	
Interim Executive Director of the South )	
Carolina State Election Commission; )	
John Wells, JoAnne Day, Clifford J. )	
Elder, Linda McCall and Scott Moseley, )	
In their official capacity as member of the )	
South Carolina State Election Commission, )	
)	
Defendants. )	
)	

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Defendants, Howard Knapp, in his official capacity as interim Executive Director of the South Carolina State Election Commission, and John Wells, JoAnne Day, Clifford Elder, Linda

McCall, and Scott Moseley, in their official capacities as members of the South Carolina State Election Commission (“SEC Defendants”), submit these responses to the Local Rule 26.01 Interrogatories:

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

ANSWER: None.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

ANSWER: The Plaintiffs have not demanded a jury trial, and their claims are not triable by jury.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

ANSWER: All of the SEC Defendants are individuals sued in their official capacities, so no public-ownership issues exist.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

ANSWER: This matter is properly in this division because the SEC Defendants are located here.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

ANSWER: No.

**(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

ANSWER: The last name of Defendant Howard Knapp, in his official capacity as interim Executive Director of the South Carolina State Election Commission, was misspelled as "Knabb" in the original filing. That error has since been corrected, and all the SEC Defendants are now properly identified.

**(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

ANSWER: Not applicable.

Respectfully submitted,

s/ Michael R. Burchstead

M. Elizabeth Crum (Fed. Bar #372)

Jane Trinkley (Fed. Bar #4143)

Michael R. Burchstead (Fed. Bar #102967)

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*Attorneys for Election Commission Defendants*

November 29, 2021  
Columbia, SC